

Fidel Cassino-DuCloux
Assistant Federal Public Defender
101 S.W. Main Street, Suite 1700
Portland, Oregon 97204
(503) 326-2123 Telephone
(503) 326-5524 Facsimile
Fidel_Cassino-DuCloux@fd.org

Attorney for Defendant

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON**

UNITED STATES OF AMERICA,

Case No. 3:20-cr-00295-HZ

v.

Plaintiff,

**DECLARATION OF COUNSEL IN
SUPPORT OF UNOPPOSED MOTION
TO CONTINUE TRIAL DATE**

PATRICK STAFFORD,

Defendant.

I, Fidel Cassino-DuCloux, declare:

1. I am counsel of record in this matter for the defendant, Patrick Stafford.
2. A continuance of the current trial date of February 2, 2021, is necessary because

Mr. Stafford has accepted a deferred disposition offer from the government. This requires him to continue the trial until April 5, 2021, while he fulfills certain requirements. Mr. Stafford asks the Court to continue his trial date so that he can meet his obligations under the agreement.

3. I have spoken with Mr. Stafford and explained the reasons for requesting a continuance and his rights under the Speedy Trial Act. Mr. Stafford agrees with the reasons for the continuance and waives his rights to a speedy trial.

4. Assistant United States Attorney Ashley Cadotte has been contacted and does not object to this continuance.

5. This declaration is made in good faith and in support of the motion for continuance of the trial date in this case.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge and belief and that this declaration was executed on October 6, 2020, in Portland, Oregon.

/s/ Fidel Cassino-DuCloux
Fidel Cassino-DuCloux
Assistant Federal Public Defender